## UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

In re:	)	
	)	Case No. 09-49467
Monette E. Saccameno,	)	Chapter 13
	)	
Debtor,	)	Hon. Timothy A. Barnes
	)	

## UNOPPOSED MOTION TO AMEND BRIEFING SCHEDULE ON MOTION FOR SANCTIONS

Ocwen Loan Servicing, LLC ("Ocwen") and U.S. Bank National Association, as Trustee, for the C-BASS Mortgage Loan Asset Backed Certificates, Series 2007-RP1 ("U.S. Bank as Trustee") ("Respondents"), by their undersigned counsel, and for their Motion to Amend Briefing Schedule on Debtor Monette E. Saccameno's ("Debtor") Motion for Violations of Discharge Injunction and for Sanctions ("Motion for Sanctions" or "Motion") state:

- 1. On February 9, 2015, the Court reopened this chapter 13 case to allow Debtor to file a Motion for Sanctions against Ocwen and U.S. Bank as Trustee. (Doc. #59.)
- 2. On February 9, 2015, the Court entered a briefing schedule on the Motion with the response due on March 9, 2015, and the reply due on March 30, 2015. (Doc. #59.) The Court set a hearing date on the Motion on April 20, 2015. (*Id.*)
- 3. Since the filing of the Motion, the parties have been in active settlement negotiations to resolve the issues raised in the Motion. While these settlement discussions continue, Respondents request additional time of 21 days to respond to the Motion.
  - 4. Debtor has no objection to the granting of this request for an extension of time.
- 5. With the granting of this Motion, the other dates in the February 9, 2015 Order will also need to be changed.

Case 09-49467 Doc 64 Filed 03/09/15 Entered 03/09/15 13:43:07 Desc Main Document Page 2 of 2

- 6. This request is not brought for purposes of delay, nor will it prejudice the Debtor.
- 7. A proposed order is being filed with this Motion.

WHEREFORE, Ocwen Loan Servicing, LLC and U.S. Bank National Association, as Trustee, for the C-BASS Mortgage Loan Asset Backed Certificates, Series 2007-RP1 respectfully request that the Court grant this Motion to Amend Briefing Schedule for reasons set forth herein, and that it enter any further relief that it deems just and proper.

Date: March 9, 2015 By: /s/ Robert W. Brunner

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Attorney for Deutsche Bank National Trust Co. as Trustee

## **CERTIFICATE OF SERVICE**

The undersigned certifies that on March 9, 2015 a true and correct copy of the foregoing *Motion to Amend Briefing Schedule* was served via the Court's electronic filing system upon all counsel of record.

<u>/s/</u>	<u>Robert</u>	<u>W. Brunner</u>	